

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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Margetta Langlois

v.

Michael Hugo et al  
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) Civil Action No. 04-11588-RWZ  
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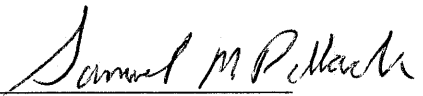
PRETRIAL SCHEDULING STATEMENT

The Defendants respectfully submit to this Honorable Court the Pretrial Scheduling Statement set forth hereinbelow.

1. The Defendants' propose the following pretrial schedule:
  - a. The defendants do not seek to add any parties. The defendants should be allowed until November 1, 2004 to file responsive pleadings to the Complaint.
  - b. The defendants anticipate discovery on the following subjects:
    - i. All bases for plaintiff's allegations of wrongdoing;
    - ii. All bases for plaintiff's claim for damages;
    - iii. The existence of witnesses and their knowledge; and
    - iv. The bases for opinions offered by expert witnesses.
  - c. Discovery will commence as early as October 18, 2004 and conclude by January 31, 2005.
  - d. The parties may request permission to serve more than 25 interrogatories.

- e. The plaintiff may call expert witnesses at trial. Plaintiff will designate all trial experts and provide opposing counsel with reports from retained experts pursuant to Fed. R. Civ. P. 26(a)(2) by December 2, 2004. Depositions of any such experts will be completed by January 5, 2005.
  - f. The defendants may call expert witnesses at trial. The defendants will designate all trial experts and provide opposing counsel with reports from retained experts pursuant to Fed. R. Civ. P. 26(a)(2) by January 30, 2005. Depositions of any such experts will be completed by February 25, 2005.
  - g. A damage analysis will be provided by any party who has a claim or counterclaim for damages by December 16, 2004. Amended analysis due five (5) days prior to pretrial.
  - h. Dispositive motions will be filed on or before January 3, 2005.
  - i. Witness and exhibit lists from both parties are due five (5) days prior to pretrial. Both parties shall have 14 days from the service of final lists of witnesses and exhibits to file objections pursuant to Rule 26(a)(3).
2. Pursuant to Local Rule 16.1 the plaintiff has failed to present a written settlement proposal to the defendants.

The Defendants,  
Samuel M. Pollack  
Albert Flanders

By 

Samuel M. Pollack, Esq.

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